

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

KABEER KHAN,	:	
	:	
Plaintiff	:	
	:	
V.	:	CIVIL ACTION NO:
	:	
7-ELEVEN, INC.,	:	1:14-CV-13384-WGY
	:	
Defendant	:	

PLAINTIFF'S MOTION FOR CONTINUANCE AND FOR RECONSIDERATION FOR
DISCOVERY

Now comes the plaintiff, Kabeer Khan, by his attorneys, and moves that the Honorable Court under F.R.C.P. Rule 40 and Local Rule 40.3 for good cause:

- A. continue the consolidated opposing motions for preliminary injunctions and the trial on the merits, said consolidation pursuant to F.R.C.P. Rule 65(a)(2), as the Court may order;
- B. reconsider and to allow the plaintiff time to conduct discovery of the defendant's witnesses and exhibits in order that the plaintiff's attorneys may be properly prepared for the hearing on the consolidated motions and trial on the merits; and
- C. other relief as the Court deems just.

The plaintiff states, by his attorney:

- (i) that the plaintiff has not made any previous motion for continuance;
- (ii) that a hearing was held September 19, 2014 in which the Court ordered a consolidated trial for October 1, 2014 at 9:00 AM; and
- (iii) that the Court made no discovery order at the hearing held September 19, 2014.


This motion is supported by:

1. Memorandum in Support of said Motion for Continuance and Reconsideration for Discovery; and
2. Declaration by John E. Pearson (Exhibit A)

Respectfully submitted,

The Plaintiff,
KABEER KHAN,
By his attorney,

Dated: September 26, 2014



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CERTIFICATE OF SERVICE

I, John E. Pearson, Esquire, hereby certify that this *Plaintiff's Motion for Continuance and Reconsideration for Discovery* filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and electronic copies will be sent by electronic mail to those indicated as non-registered by first class mail, postage prepaid on September 26, 2014.

Dated: September 26, 2014



John E. Pearson